

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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REGION IV

345 COURTLAND STREET ATLANTA, GEORGIA 30365

APR 15 1988

EPA — REGION IV

ATLANTA, GA

DATE:

SUBJECT: Review of the Draft Work Plan (WP) for the Medley Farm Site

FROM:

Gail D. Mitchell, Chief

Ground-Water Technology Unit

TO:

Jon K. Bornholm

Superfund Project Manager

The Medley Farm Draft WP was reviewed as per your request of March 31, 1988. The following comments address inconsistencies and omissions regarding surface water issues.

Comments and Recommendations:

p.14 -- An additional objective of the RI should be determining the nature and extent of surface water and sediment contamination, if any.

p.15 -- An additional objective of the Phase I Field investigation should be to provide an initial assessment of surface water and sediment contamination and characterize the nature of any such surface water contamination. The Phase I Field Investigation should include the surface water and sediment sampling proposed for Phase II. There have been no previous efforts to establish the quality of the surface water on and adjacent to Medley Farm, thus definition of potential surface water contamination should be given priority in the site investigation. It may be necessary to implement biological testing of surface waters and/or sediments based upon initial water quality data; therefore, the water quality data should be obtained as early as possible in the investigation so that the performance of subsequent biological sampling will not delay the RI report.

p.18 -- The identification of receptors should involve both environmental and human receptors.

p.32 -- The proposed surface water and sediment sampling is adequate for a preliminary investigation and, as discussed above, should be performed during Phase I. If Phase I ground-water monitoring reveals that ground water discharges to Thicketty Creek and the Big Blue Branch, as well as Jones Creek, Phase II sampling will be expanded to include Thicketty Creek and the Big Blue Branch.

It is assumed that surface water and sediment samples will be analyzed for HSL compounds; however, this is not mentioned in this section. The analytical procedures should be clearly indicated under the sampling protocol.

 $\rho.40$ -- The preliminary ARAKs for surface water are the Clean Water Act and, if these creeks are potential sources of potable water, the Safe Drinking Water Act.

If there are any questions or concerns regarding the above comments, please call Laura Mazanti at x3866.